

EXHIBIT 32

From: [Murphy, Michael D.](#)
To: [Beral, Arash](#); [Malynn, Todd M.](#); [Zolliecoffer, Jordan](#); [James, Pauletta](#)
Subject: RE: [EXT] Joint Statement re Contempt Negotiations March 10 2025(169351412.1)-C-C
Date: Monday, March 10, 2025 7:56:02 PM
Attachments: [Joint Statement re Contempt Negotiations March 10 2025\(169351412.1\)-C-C-C \(002\)-C.docx](#)

Two changes

It is not an “alleged” noncompliance.



Michael Murphy

Partner

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☐ mdmurphy@foxrothschild.com

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From: Beral, Arash <arash.beral@blankrome.com>

Sent: Monday, March 10, 2025 7:48 PM

To: Murphy, Michael D. <mdmurphy@foxrothschild.com>; Malynn, Todd M. <Todd.Malynn@BlankRome.com>; Zolliecoffer, Jordan <JZolliecoffer@foxrothschild.com>; James, Pauletta <PJames@foxrothschild.com>

Subject: RE: [EXT] Joint Statement re Contempt Negotiations March 10 2025(169351412.1)-C-C

Some minor further edits.

Arash Beral | BLANKROME

2029 Century Park East | Los Angeles, CA 90067

[Arash Beral](#) | [Blank Rome LLP](#)

From: Murphy, Michael D. <mdmurphy@foxrothschild.com>

Sent: Monday, March 10, 2025 7:15 PM

To: Beral, Arash <arash.beral@blankrome.com>; Malynn, Todd M. <Todd.Malynn@BlankRome.com>; Zolliecoffer, Jordan <JZolliecoffer@foxrothschild.com>; James, Pauletta <PJames@foxrothschild.com>

Subject: Fw: [EXT] Joint Statement re Contempt Negotiations March 10 2025(169351412.1)-C-C

From: mdmurphyla@gmail.com <mdmurphyla@gmail.com>

Sent: Monday, March 10, 2025 7:13:54 PM

To: Murphy, Michael D. <mdmurphy@foxrothschild.com>

Subject: [EXT] Joint Statement re Contempt Negotiations March 10 2025(169351412.1)-C-C

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Attorneys for Plaintiff SHAKEY'S
PIZZA ASIA VENTURES, INC.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

SHAKEY'S PIZZA ASIA VENTURES,
INC, a Philippines corporation,

Plaintiff,

v.

PCJV USA, LLC, a Delaware limited
liability company; PCI TRADING,
LLC, a Delaware limited liability
company; GUY KOREN, an individual;
POTATO CORNER LA GROUP, LLC,
a California limited liability company;
NKM CAPITAL GROUP, LLC, a
California limited liability company; J &
K AMERICANA, LLC, a California
limited liability company; J&K
LAKEWOOD, LLC, a California
limited liability company; J&K
VALLEY FAIR, LLC, a California
limited liability company; J & K
ONTARIO, LLC, a California limited
liability company; HLK MILPITAS,
LLC, a California, limited liability
company; GK CERRITOS, LLC, a
California, limited liability company;
J&K PC TRUCKS, LLC, a California
limited liability company; and, GK
CAPITAL GROUP, LLC, a California
limited liability company and DOES 1
through 100, inclusive,

Defendants.

Case No. 2:24-CV-04546-SB(AGRx)

Hon. Stanley Blumenfeld

**JOINT STATUS REPORT OF
PLAINTIFF AND DEFENDANTS
REGARDING ONGOING MEET
AND CONFER DISCUSSIONS**

Date: February 28, 2025

Time: 8:30 a.m.

Courtroom: 6C

Complaint Filed: May 31, 2024

Trial Date: August 4, 2025

1 PCJV USA, LLC, a Delaware limited
2 liability company; PCI TRADING LLC,
3 a Delaware limited liability company;
4 POTATO CORNER LA GROUP LLC,
5 a California limited liability company;
6 GK CAPITAL GROUP, LLC, a
7 California limited liability company;
8 NKM CAPITAL GROUP LLC, a
9 California limited liability company; and
10 GUY KOREN, an individual,

11 Counter-Claimants,

12 v.

13 SHAKEY'S PIZZA ASIA VENTURES,
14 INC, a Philippines corporation,

15 Counter Defendant.

16 PCJV USA, LLC, a Delaware limited
17 liability company; PCI TRADING LLC,
18 a Delaware limited liability company;
19 POTATO CORNER LA GROUP LLC,
20 a California limited liability company;
21 GK CAPITAL GROUP, LLC, a
22 California limited liability company;
23 NKM CAPITAL GROUP LLC, a
24 California limited liability company; and
25 GUY KOREN, an individual,

26 Third Party Plaintiffs,

27 v.

28 PC INTERNATIONAL PTE LTD., a
Singapore business entity; SPAVI
INTERNATIONAL USA, INC., a
California corporation; CINCO
CORPORATION, a Philippines
corporation; and DOES 1 through 10,
inclusive,

Third Party Defendants.

JOINT STATEMENT

Pursuant to this Court's Order of March 4, 2025 (Dkt. 117), Plaintiff and Defendants PCJV USA, LLC and Guy Koren (collectively, "Defendants") submit the following status report, regarding their ongoing meet and confer efforts to resolve (1) "any outstanding violations of the Court's preliminary injunction," and (2) "the amount of reasonable attorney's fees to award to Plaintiff in connection with its contempt motion."

On Wednesday afternoon, March 5, 2025, counsel for Plaintiff, Michael Murphy, and counsel for Defendants, Arash Beral and Todd Malynn, met, in person, at the offices of Fox Rothschild to discuss both of the topics remaining to be resolved. Mr. Murphy presented to Defendants' counsel some pictures of outstanding violations that Plaintiff was prepared to submit on February 28, 2025, which he sent by email to Defendants' counsel the following day (Thursday, March 6, 2025). Mr. Beral indicated that he would address these with his clients so that they could address any remaining issues with the store entities. Defendants' counsel provided updates and photos ~~today~~in the hours before this filing, however, Plaintiff has not had an opportunity to evaluate, ask further questions regarding, or conduct its own due diligence as to these representations.

As to the reasonable fees question, at the in person meet and confer, Mr. Murphy raised certain categories of fees that he would consider as damages from contempt. After that discussion, he informed Defendants' counsel that he would forward his fee invoices for Defendants' counsel's review. On Saturday, March 8, Mr. Murphy sent an email itemizing the fees and costs that Plaintiff maintains was caused by, or would not have been incurred but for, Defendants' ~~alleged~~ noncompliance with the injunction. Plaintiff's counsel included backup in the form of invoices and then proposed as a means to resolve the dispute, a reduction of 30% of the total fees Plaintiff alleges to have been incurred. Defendants' counsel was

1 able to download the fee invoices today and requested more time to review them,
2 which Plaintiff agreed to grant. Defendants' counsel intends to respond to the fee
3 proposal in short order.

4 In light of the foregoing, both Plaintiff and Defendants agree that an
5 extension makes sense. It is the belief of the parties that they are moving in the right
6 direction, and that it is likely that there will be resolution. The Parties respectfully
7 request leave for additional time to thoroughly discuss these issues, and to file a
8 further report on or by Wednesday, March 12, 2025.

9 Dated: March 10, 2025

FOX ROTHSCHILD LLP

10
11
12 Michael D. Murphy
13 Jordan Zollicoffer
14 Attorneys for Plaintiff SHAKEY'S
PIZZA ASIA VENTURES, INC.

15
16 DATED: March 10, 2025

BLANK ROME LLP

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18
19 By: /s/ Arash Beral

20 Arash Beral
21 Todd Malynn
22 Victor Sandoval
23 Attorneys for Defendants
24
25
26
27
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CERTIFICATE OF SERVICE

The undersigned certifies that, on February 27, 2025, the foregoing document was electronically filed with the Clerk of the Court for the United States District Court, Central District of California, using the Court's ECF filing system. I further certify that all counsel for all parties to this action are registered CM/ECF user and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct.

Dated: February 27, 2025

FOX ROTHSCHILD LLP

Michael D. Murphy
Attorneys for Plaintiff SHAKEY'S
PIZZA ASIA VENTURES, INC.